

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

**CHARITY CHIDINMA  
EMERONYE SWIFT,**

**Plaintiff,**

**v.**

**FRONTIER AIRLINES, INC. (a Colorado  
corporation), and JANE DOE,**

**Defendants.**

**Civil Action No. 1:14-CV-1139**

**Hon. Judge Anthony J. Trenga  
Hon. Magistrate Judge Ivan D. Davis**

**FRONTIER AIRLINES, INC.'S MOTION TO ENFORCE  
THE SETTLEMENT AGREEMENT AND FOR OTHER RELIEF**

Defendant Frontier Airlines, Inc. ("Frontier"), by counsel and pursuant to Federal Rule of Civil Procedure 41(b) and Local Rule 7(e), moves this Court to enforce the Settlement Agreement reached between the parties, dismiss the case in its entirety and with prejudice, and award to Frontier all costs and fees incurred in bringing this motion.

Plaintiff and Frontier reached a complete settlement agreement regarding this litigation. The terms and conditions of that agreement are not disputed and can be determined by this Court. For the reasons more fully set forth in the accompanying memorandum of law, Frontier's Motion to Enforce the Settlement is warranted.

Dated: January 26, 2015

Respectfully submitted,

/s/  
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*Attorneys for Frontier Airlines, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that, on January 26, 2015, I served the following via U.S. Mail, postage prepaid, and via electronic case filing:

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/s/\_\_\_\_\_  
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